

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:

**CASE NO.: 23-16925
CHAPTER 13**

Claudia Webb,

Debtor.

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

Nationstar Mortgage LLC ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE #3), and states as follows:

1. Debtor, Claudia Webb ("Debtors"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on December 18, 2023.
2. Secured Creditor holds a security interest in the Debtor's real property located at 522 Buckley Court, University Park, IL 60484, by virtue of a Mortgage recorded on August 4, 2005 at Instrument No. 2005132077 of the Public Records of Will County, FL. Said Mortgage secures a Note in the amount of \$135,000.00.
3. The Debtor filed a Chapter 13 Plan on December 18, 2023.
4. The Plan fails to identify the mortgage claim or provide for treatment of Secured Creditor's claim. The Plan does not reference the mortgaged property and does not provide for surrender or sale of the property. The Debtor's Schedules do state the property is owned by the Debtor and does list the mortgage debt.
5. Secured Creditor objects to the Plan and seeks clarification as to Debtor's intentions in regard to the subject property and the mortgage.

6. The Plan fails to meet the requirements of 11 U.S.C. § 1322(b)(3) and (b)(5) and 1325(a)(5) with respect to the Secured Creditor's claim and the subject mortgage ,and therefore, fails to meet the confirmation requirements of 11 U.S.C. § 1325(a)(1) .

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 23, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

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